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February 27, 2012

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Dear Sir or Madam:

Enclosed is the Quarterly Report for the period from November 1, 2011 to January 31, 2012 as required by the Consent Decree for Civil Action No. CV-10-JEO-1902-S.



Jeet Radia

Senior Vice President – Environment, Safety & HR

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February 27, 2012

**Quarterly Report for the period from November 1, 2011 to January 31, 2012
Required Under Consent Decree for Civil Action No. CV-10-JEO-1902-S**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Jeet Radia
Senior Vice President – Environment, Safety & HR

CONSENT DECREE UNDER CIVIL ACTION

No. [CV] 10-JEO-1902-S

McWANE, INC. QUARTERLY REPORT

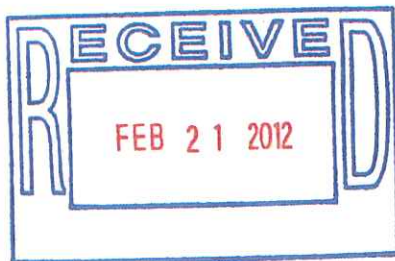
NOVEMBER 1, 2011 – JANUARY 31, 2012

Compliance Focused Environmental Management System Audit

Report for:

Clow Water Systems
Coshocton, OH

Assessment dates: January 30 – February 2, 2012



This report was presented to and accepted by:

Name:	Jeet Radia
Job title:	Senior Vice President – EHS/HR

Introduction

An onsite audit of the Clow Water Systems Compliance Focused Environmental Management System (EMS) was completed January 30 to February 2, 2012. The scope of the audit included all activities associated with the manufacture of ductile iron pipe and fittings at the Clow Water Systems located at 2266 South 6th Street, Coshocton, OH. Major industrial processes within the scope of the audit included Cupola, Core Making, Sand Molding, Casting, Finishing, Melting, Casting, Hot Line (annealing oven through test press), Finishing (cement lining, painting, and bundling), Sand Foundry, Maintenance, Shipping, and Wastewater Treatment.

The audit was completed in accordance with the provisions of ISO 19011, Guidelines for Quality and EMS Auditing. Audit findings were identified by comparing collecting and comparing audit evidence to the requirements of the CFEMS Enforcement Agreement Guidance issued August 1997 (revised June 2005) and requirements specific to the Clow Water Systems EMS. Audit findings are summarized in the process tables in the text, below.

Assessment Outcome

The audit concluded the EMS has been implemented and conforms to the requirements of the Compliance Focused Environmental Management System specification. The system appears effective as designed and provides the basis for continual improvement of the EMS through objectives, targets, audits, corrective actions and the management review process. Environmental objectives have been established that support the primary commitments set forth in the organization's environmental policy.

Audit findings were graded as either a major or minor non-conformance or opportunity for improvement as follows:

Major Nonconformance:

A major nonconformity is a finding defined as the absence of, or the failure to implement and maintain, one or more required management system requirements, or a situation which would, on the basis of objective evidence, raise significant doubt as to the capability of the management system to achieve the policy and objectives of the organization.

Minor Nonconformance:

A minor non-conformance represents a finding which is a sporadic lapse in implementation of the system or a deviation from the system.

Opportunity for Improvement:

An opportunity for improvement represents a recommendation or an optional enhancement to the EMS and does not represent a systemic failure of the EMS.

The audit identified four Minor Nonconformances and three Opportunities for Improvement.

Executive Summary

Based on the findings of the audit, areas for management attention include the following:

- Supplement the contractor safety training with more environmental information and better document the communication of these environmental requirements (i.e., what specific information was communicated).
Minor Nonconformance
- Ensure the root cause analysis is utilized for developing corrective and preventive actions whenever, appropriate.
Minor Nonconformance
- Ensure the stationary monitoring equipment associated with the wastewater treatment system is calibrated at the required frequency. This inconsistency in the calibration schedule was also identified in the last internal audit.
Minor Nonconformance
- Ensure checklists are completed in such a way that they fulfill the purpose of ensuring processes are completed in accordance with planned arrangements (e.g., CWP-EWI-094-01-F02, Storage Tank Unloading Checklists completed in Hot Line and Finishing and Sand Foundry).
Minor Nonconformance
- Consider including the Environmental Manager on the agenda for the Community Advisory Council Meetings to augment the communication of environmental information at those meetings.
Opportunity for Improvement
- Consider reformatting the management review meeting minutes to align with the CFEMS to ensure all elements are reviewed.
Opportunity for Improvement
- Ensure waste containers are consistently labeled in such a way that their contents can be easily determined.
Opportunity for Improvement

Assessment of:	EMS Elements: - EMS Policy (CFEMS-1); Organization, Personnel and Oversight of the EMS (CFEMS-2); Accountability and Responsibility (CFEMS-3)	Auditee(s):	Heather Rain Water, Dennis Zurakowski, Ward Pate
Audit trails and sources of evidence:			
McWane EMS Manual and EMS Policy, CWP-EWI-102, Roles, Responsibilities and Authority CWP-EWI-106-01, Internal Communications CWP-EWI-106-02, Communication External Communication CWP-EWI-102-F01, Compliance Calendar – Responsibility Matrix CWP-EWI-105-01, Reporting Significant Matters HSP-013, Contractors			
Evaluation and conclusions:			
<p>Policy The environmental policy contains all of the requisite inputs specified in the CFEMS guidance document and includes a statement of management commitment to provide the resources necessary to implement and maintain the EMS. The policy has been communicated to employees and persons working on behalf of the organization via training, hard hat stickers and postings. There have not been any external requests for the policy. Any such requests are addressed by the Environmental Manager per CWP-EWI-106-02.</p> <p>Organization, Personnel and Oversight of EMS EMS roles and responsibilities are described in CWP-EWI-102, Roles, Responsibility and Authority. An environmental management representative (Environmental Manager) has been appointed by top management and records of the appointment are maintained. Roles and responsibilities are described on a matrix for each department which lists responsibilities by job description.</p> <p>The communication of environmental information is facilitated through training, meetings, EHS Management System web site, among other means as described in CWP-EWI-106-01. The plant also communicates environmental information via a quarterly newsletter and TV monitors located in break rooms. Significant environmental matters are communicated through the organization as per CWP-EWI-105 with the use of Dakota Scout which provides for automatic notification and escalation of follow up actions.</p> <p>General environmental requirements are communicated to contractors and service providers as part of their initial safety training. More specific requirements are informally discussed with the Project Manager.</p> <p>Minor Nonconformance</p> <p>Accountability and Responsibility Potential consequences of environmental non-conformances are communicated via training and huddles. Incentives for environmental performance are described in CWP-EWI-102 which is reflected in year-end bonuses at the General Management level.</p>			

Assessment of:	EMS Elements: Environmental Requirements (CFEMS-4)	Auditee(s):	Heather Rain Water, Dennis Zurakowski, Ward Pate
Audit trails and sources of evidence:			
CWP-EWI-104-01, Management of Change CWP-EWI-106-01, Communication CWP-EWI-003-01, Permit and Legal Requirements CWP-EWI-118-02, Environmental Inspections Communication records – effluent toxicity testing			
Evaluation and conclusions:			
<p>Applicable environmental requirements (tasks and data management) are identified by the Environmental Manager and entered into opsInfo. There are presently no overdue tasks in opsInfo. New and changing regulatory requirements are monitored via webinars, conferences, professional associations, and publications.</p> <p>Agency communications are managed in accordance with CWP-EWI-106. Records of agency communications are maintained including recent correspondence with the Ohio EPA regarding toxicity testing of the facility's wastewater effluent.</p>			

Assessment of:	EMS Elements: Assessment Prevention and Control (CFEMS-5)	Auditee(s):	Heather Rain Water, Dennis Zurakowski, Ward Pate
Audit trails and sources of evidence:			
CWP-EWI-104, Management of Change CWP-EWI-107, Aspects and Impacts Identification and Ranking CWP-EWI-110, Compliance Audits CWP-EWI-104-01, Management of Change Checklist (Muller Supply Elevator, Finishing Department Air Surge Tank, and Domnick Hunter Refrigerated Air Dryer)			
Evaluation and conclusions:			
<p>Environmental aspects have been identified and evaluated for significance using a qualitative process. Aspects data are reviewed and updated at least annually and on an on-going basis in accordance with the requirements of CWP-EWI-104, Management of Change.</p> <p>Operational controls have been established in line with the facility's significant environmental aspects. Conformance with operational controls is evaluated via routine inspections specified in EWIs, internal audits, external audits, and the facility preventive maintenance program. Environmental monitoring equipment is inputted into opsInfo, which lists a responsible person and calibration frequency. Corresponding records of the calibrations are maintained.</p> <p>The facility Hazardous Waste Contingency Plan and SPCC plan describe response procedures for spills/releases of hazardous waste and oils, respectively. Emergency scenarios are reviewed through annual verification of isolation valve operations and emergency response call-down list.</p> <p>The environmental aspects, impacts and regulatory requirements associated with new and changing circumstances are addressed in accordance with CWP-EWI-104, Management of Change. An environmental checklist is completed for capital expenditure requests as required and as evidenced through a review of requisitions and random sampling of checklists completed in 2011.</p>			

Assessment of:	EMS Elements: Environmental Incident and Non-Compliance Investigations (CFEMS-6)	Auditee(s):	Heather Rain Water, Dennis Zurakowski, Ward Pate
Audit trails and sources of evidence:			
CWP-EWI-001-02, Reporting an Incident CWP-EWI-002, Incident Investigation and Analysis CWP-EWI-001-01-F01, Environmental Incident Reporting Form (various generated in 2011) CWP-EWI-001-02-F02, Environmental Incident Analysis Form			
Evaluation and conclusions:			
Corrective actions are inputted into Dakota Tracer – this database lists the finding, root cause, corrective and preventive actions and is used to track the corrective actions for completion. It is noted that an investigation of root cause was not completed for audit findings in all cases. Minor Nonconformance			

Assessment of:	EMS Elements: Environmental Training Awareness and Competence (CFEMS-7)	Auditee(s):	Heather Rain Water, Dennis Zurakowski, Ward Pate
Audit trails and sources of evidence:			
CWP-EWI-011, Environmental Training 2012 Clow Water Systems Training Matrix CWP-EWI-102-01-F01 DOT Training Records SWPPP Training Records SPCC Training Records Semi-annual Method 9 Training Records			
Evaluation and conclusions:			
Environmental training needs have been identified on a training matrix. Training records were reviewed for several environmental programs and were found to be complete and up to date. Training records are maintained electronically and in a hard copy format. Training effectiveness is verified through post course examinations. Basic competencies for persons responsible for maintaining compliance with regulatory requirements are defined in CWP-EWI-011-F02.			

Assessment of:	EMS Elements: Environmental Planning and Organization Decision Making (CFEMS-8)	Auditee(s):	Heather Rain Water, Dennis Zurakowski, Ward Pate
Audit trails and sources of evidence:			
EP-108, Establishing Reviewing and Tracking Goals and Objectives EP-109, Management Review CWP-EWI-108-F01, Environmental Goal and Objective Action Plans			
Evaluation and conclusions:			
Environmental objective and targets have been established to reduce mobile equipment leaks, reduce hazardous paint waste from 2011 levels, achieve zero uncontrolled overflows from the wastewater treatment plant, and eliminate cement tracking. Management programs (action plans) have been prepared which describe the tasks, responsibilities and timeframes for their completion. Progress toward the completion of the action plans is reviewed at least monthly at Environmental Council Meetings. Objectives and targets attained in 2011 included the elimination of dust complaints and zero non-compliant discharges from the wastewater treatment plant.			

Assessment of:	EMS Elements: Maintenance of Records and Documentation (CFEMS-9)	Auditee(s):	Heather Rain Water, Dennis Zurakowski, Ward Pate
Audit trails and sources of evidence:			
CWP-EWI-114-01, Records Retention CWP-EWI-115-01, Document Control McWane Records Retention Policy			
Evaluation and conclusions:			
System documentation includes the EMS Manual, Environmental Directives, Environmental Procedures, and Environmental Work Instructions. Documentation is maintained in an electronic format on the corporate EHS dashboard. Permits and plans specific to the facility are maintained in the "critical documents" folder. Hard copies of the same are maintained in the environmental department. Documentation is reviewed and updated on an on-going basis - any changes are noted using "track changes". Forms in use and reviewed through the audit process were found to the current version in all cases.			
Records are maintained in accordance with the McWane records retention policy and guidance. Records requested for review through the audit process were evidenced to be readily retrievable, complete and up to date.			

Assessment of:	EMS Elements: Pollution Prevention (CFEMS-10)	Auditee(s):	Heather Rain Water, Dennis Zurakowski, Ward Pate
Audit trails and sources of evidence:			
CWP-EWI-108, Establishing Reviewing and Tracking Goals Objectives CWP-EWI-121, Pollution Prevention CWP-EWI-121-01-F01, Source Reduction and Waste Minimization Plan (Rev. July 2011)			
Evaluation and conclusions:			
Several processes are employed to identify and pursue pollution prevention opportunities including – the aspects and impacts evaluation processes incorporates pollutions prevention in the scoring convention, the MOC process notes whether the proposed change incorporates a pollution prevention opportunity, and pollution prevention opportunities are considered when setting objective and targets. Pollution prevention metrics are maintained including waste and hazardous waste generation, energy use, natural gas usage, water use, and air emissions. Recent and notable pollution prevention activities include upgrading the annealing furnace with regenerative burners which has reduced natural gas usage by 30%, capturing/recycling hydraulic oil leaked from casting machines, and removing moisture from the blast air to reduce coke usage. A plural pump system in the Flange department has also reduced the generation of paint waste.			

Assessment of:	EMS Elements: Continuing Program Evaluation and Improvement (CFEMS-11)	Auditee(s):	Heather Rain Water, Dennis Zurakowski, Ward Pate
Audit trails and sources of evidence:			
CWP-EWI-109, Management Review CWP-EWI-019-01-F01, Management Review Documentation Form CWP-EWI-116, EMS Internal Auditing June 2011 Internal EMS Audit Report Dakota Tracer Third Party Regulatory Compliance Audit (August 2011) CWP-EWI-109-01-F01, Management Review Documentation Form (May and November 2011)			
Evaluation and conclusions:			
<p>First, second and third party compliance audits are conducted in accordance with a schedule established by corporate that provides for annually auditing the facility's compliance with environmental requirements by an independent auditor. A third party audit was completed in August 2011 evidencing conformance with this requirement.</p> <p>Top management reviews of the EMS are completed on a monthly basis through Environmental Council Meetings - every six months a comprehensive evaluation of the EMS is completed in accordance with CWP-EWI-109. Minutes of the review are maintained as a record of its completion.</p> <p>It could be an improvement if the Management Review Documentation Form be formatted so that it aligns with requirements of the CFEMS.</p> <p>Opportunity for Improvement</p> <p>CWP-EWI-116 provides for completing one comprehensive internal audit of the EMS annually. Audits are completed by persons qualified to do so on the basis of training received at the onset of the audit. Audit findings are entered into Dakota Tracer to track for completion</p>			

Assessment of:	EMS Elements: Public Involvement/community Outreach (CFEMS-12)	Auditee(s):	Heather Rain Water, Dennis Zurakowski, Ward Pate
Audit trails and sources of evidence:			
CWP-EWI-112, Public Involvement and Community Outreach McWane Advisory Council meeting minutes (August 11, 2011)			
Evaluation and conclusions:			
The facility demonstrated public involvement/community outreach efforts through routine Community Advisory Council (CAC) meetings, the next of which is scheduled for March 2012. The Environmental Manager also participates in Rotary and uses that as an opportunity to communicate information regarding the facility's environmental performance. It could be an improvement if the CAC meeting agenda included an opportunity for the Environmental Manager to report out on environmental information.			
Opportunity for Improvement			

Assessment of:	Melt/Pour	Auditee(s):	Rick D'Ostroph, Tony Ashcraft
Audit trails and sources of evidence:			
Ram Material Inspection Form CWP-EWI-091-01, Air Operations Daily Inspections CWP-EWI-091-F01, Cupola Control System Operating Parameters Daily Checklist Cupola Stack Temperature Monitoring Data CWP-EWI-008-03-F03, Waste Handling and Management CWP-EWI-091-07-F03, Inspection of Melting Stacks			
Evaluation and conclusions:			
Persons interviewed described operational controls related to scrap truck inspections, daily air inspections for permit compliance including stack temperature, emission system pressure drop, and water flow rates. Corresponding records are recorded on CWP-EWI-091-01-F01. Persons interviewed are aware of the procedures for waste management and emergency response and described department efforts to continually improve and prevent pollution through efforts such as making improvements to the annealing oven (natural gas conservation) and installing a dehumidification system (reduction of coke use).			

Assessment of:	Pipe Casting, Sand Foundry	Auditee(s):	Bart Matthews, Mark Bice
Audit trails and sources of evidence:			
CWP-EWI-007-01, Spill Kit Inspection CWP-EWI-007-01-F01, Spill Kit Inspection Checklist CWP-EWI-094-01-F02, Storage Tank Unloading Checklist CWP-EWI-07-F02, Daily Inspection of Foundry Stacks CWP-091-07-F11, F034 and F062 Main Floor and Material Usage			
Evaluation and conclusions:			
<p>Interviews conducted and a review of the area operations evidenced aspects have been adequately identified and persons are aware the aspects, corresponding work instructions and general requirements of the EMS including communications and emergency response. Continual improvement efforts referenced in interviews included the use of ladle lids in Pipe Casting and material substitution efforts in the Foundry. Routine inspections are completed as required and corresponding records maintained including monthly spill kit inspections and daily inspection of foundry stacks.</p> <p>The inspection checklist was completed by the driver and Clow Supervisor as required for a delivery of sand that was being piped off at the time of the assessment. Visible emissions were noted along a seal at the top of the lime silo; however, the leak had not been noted on either the driver or Supervisor storage tank unloading checklist.</p> <p>Minor Nonconformance</p>			

Assessment of:	Maintenance	Auditee(s):	Larry Getchey, Ken Long
Audit trails and sources of evidence:			
CWP-EWI-007-01, Spill Kit Inspection CWP-EWI-007-01-F01, Spill Kit Inspection Checklist Maximo Work Order System – scrubber system PMs and dryer inspection and repair records Universal Waste Management CWP-EWI-008-05-F01, Hazardous Waste Storage and Satellite Area Inspection			
Evaluation and conclusions:			
<p>The work order system (Maximo) is effectively used for managing a variety of tasks including routine equipment inspections, calibrations and preventive maintenance. Waste streams including universal waste and aerosol cans are containerized and labelled as required.</p> <p>Drums and totes of used oil staged adjacent to the used oil tank are not labelled in all cases or placed in secondary containment. It was reported that the used oil tank is full. The tank totes and drums were pumped out within the timeframe of the audit.</p>			

Assessment of:	Hot Line and Finishing	Auditee(s):	Dave Moore, Neil Sampsel
Audit trails and sources of evidence:			
CWP-EWI-091-07-F13, Small Paint Booth Material Usage CWP-EWI-094-01-F02, Storage Tank Unloading Checklist CWP-091-07-F05, Inspection of Finishing Stacks			
Evaluation and conclusions:			
<p>Persons interviewed demonstrated an awareness of the EMS and continual improvement efforts including the installation of a heat regeneration process and modified flue controls on the annealing line to reduce natural gas usage – an approximately 30% reduction in natural gas use was reported as a result of this improvement project. The Finishing department is in the process of implementing a practice to cap and plug pipe to reduce cement waste.</p> <p>Work practices are implemented and corresponding records for monitoring paint usage, storage tank unloading, and emissions from Finishing stacks. It is noted that the Storage Tank Unloading Checklist was marked as complete (Supervisor final inspection) for a shipment of sand prior to the offloading being complete.</p> <p>Minor Nonconformance</p>			

Assessment of:	Shipping	Auditee(s):	Tom Maust
Audit trails and sources of evidence:			
CWP-EWI-007-01, Spill Kit Inspection CWP-EWI-007-01-F01, Spill Kit Inspection Checklist			
Evaluation and conclusions:			
<p>A review of the shipping area and interviews conducted evidenced an awareness of the EMS and overall management of environmental aspects associated with the Shipping operation – specifically, recycling of metal banding, butane fuel cells, aerosol cans and stormwater management. Spill kits are inspected monthly as required and maintained with the required spill clean-up material.</p>			

Assessment of:	Wastewater	Auditee(s):	Bill Coutts, Don Elson
Audit trails and sources of evidence:			
CWP-EWI-093-03-F03, Sludge Filter Press Log CWP-EWI-093-01-F0, Self-Monitoring Report CWP-EWI-018-07, Sampling and Monitoring Equipment Cleaning and Calibration CWP-EWI-018-F07-07-F01, WWTP Calibration Log opsInfo			
Evaluation and conclusions:			
Persons interviewed demonstrated an awareness and understanding of the requirements associated with the operation and maintenance of the wastewater system. Wastewater monitoring tasks are entered into opsInfo for to schedule and track for completion – annual flow meter calibration, monthly discharge monitoring reporting, daily discharge volume and pH monitoring, and quarterly toxicity monitoring, among other tasks. Continuous monitoring equipment is required to be calibrated monthly as per CWP-EWI-018-07; however, in practice such equipment is calibrated approximately once every two weeks. Minor Nonconformance			

Assessment of:	Flange	Auditee(s):	Doug Maurer
Audit trails and sources of evidence:			
CWP-EWI-007-01, Spill Kit Inspection CWP-EWI-007-01-F01, Spill Kit Inspection Checklist CWP-EWI-091-07-F12, Fittings Paint Booth Material Usage CWP-EWI-091-07-F12, Fittings Paint Booth Stack Inspections CWP-EWI-008-05, Hazardous Waste Storage and Satellite Accumulation Area Inspection CWP-EWI-008-F01, Hazardous Waste and Satellite Accumulation Area Inspection Form			
Evaluation and conclusions:			
A review of the Flange operation and interviews conducted evidenced an awareness of the EMS and overall management of environmental aspects – coolant, used oil, metal shavings, paint waste, rags, gloves and aerosol cans. Routine inspections are conducted as required and corresponding records maintained - monthly spill kit inspections, hazardous waste storage and satellite accumulation area weekly inspections, and daily paint booth stack emission inspections.			

Assessment of:	Assessment Notes	Auditee(s):	
Audit Participants			
Audit participants were as follows: Lead Auditor: Steve Rowley/Gannett Fleming, Inc. McWane Representatives: Heather Rainwater, Dennis Zurakowski, Ward Pate			
Evaluation and conclusions:			
Opening and closing meetings were held with facility management to review the audit process, audit program and findings.			